

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, DC 20554

In the matter of Annual Certification)	
of Federal Universal Service Funding)	CC Docket 96-45
for Eligible Telecommunications)	
Carriers in Virginia)	

VIRGINIA PCS ALLIANCE, L.C. AND RICHMOND 20 MHz, LLC (NTELOS)

**ANNUAL CERTIFICATION REGARDING USE OF FEDERAL
UNIVERSAL SERVICE SUPPORT**

In the above captioned docket, the Commission ordered Virginia Eligible Telecommunications Carriers (ETCs) to file by October 1, 2009 certain data regarding the use of Federal Universal Service Fund (USF) support. Virginia PCS Alliance and Richmond 20MHz (d.b.a. "NTELOS"), hereby submit the information requested by the Commission and also certifies that the use of Universal Service funding is for the purposes intended.

1) Certify that ETC will use universal service funds received in 2010 only for the provision, maintenance and upgrading of facilities and services for which such support is intended;

Included as Exhibit A is the Affidavit of R.L. McAvoy certifying the use of the federal high cost support that will be received by NTELOS in 2010.

2) Certify that ETC's basic rates in rural areas of the Commonwealth of Virginia served by non-rural incumbent local exchange carriers are reasonably comparable to urban rates;

Also included in Exhibit A is the urban rate benchmark study data for NTELOS, showing how NTELOS' basic rates compare to the urban rate benchmark of \$36.52. Note that this is the urban rate benchmark released in 2008. The 2009 figure had not been released as of the date this filing was made.

3) Provide progress reports on the ETC's five-year service quality improvement plan, detailing progress towards meeting its plan targets; an explanation of how much universal service support was received and how the support was used to improve signal quality, coverage, or capacity; and an explanation regarding any network improvement targets that have not been fulfilled. The information should be submitted at the wire center level;

Attached as Exhibit B is the NTELOS five-year plan demonstrating the use of universal service support received for ETC designated areas in Virginia. NTELOS received \$1,052,305 for 2008 high-cost universal service support for the Commonwealth of Virginia. A map of NTELOS' planned build out is also attached.

4) Provide detailed information on any outage lasting at least 30 minutes, for any service area in which an ETC is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect at least ten percent of the end users served in a designated service area, or that potentially affect a 911 special facility. Annual report must include: (1) the date and time of onset of the outage; (2) a brief description of the outage and its resolution; (3) the particular services affected; (4) the geographic areas affected by the outage; (5) the steps taken to prevent a similar situation in the future; and (6) the number of customers affected;

Attached as Exhibit C is the Outage Report of NTELOS for 2008 with the data requested.

5) Detail the number of requests for service from potential customers within its service areas that were unfulfilled for the past year. The ETC must also detail how it attempted to provide service to those potential customers;

NTELOS had no unfulfilled service requests in its service areas in 2008.

6) Detail the number of complaints per 1,000 handsets or lines;

For 2008, NTELOS had an average of 19.5 trouble tickets on a monthly basis per 1,000 customers.

7) Certify that the ETC is complying with applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service;

NTELOS has adopted the CTIA Consumer Code and provides customer service based on the principles of the Code. NTELOS also adheres to all applicable state and federal laws.

8) Certify that the ETC is able to function in emergency situations;

NTELOS has a Disaster Preparedness Plan that thoroughly outlines the processes and procedures setup to handle any emergency situation that may arise. The Plan covers the steps in place to mitigate risks, prepare for potential emergency situations, respond to emergencies, and recover from any damage as a result of the emergency. Such steps

defined for minimizing risk and preparing for emergencies include defining roles and responsibilities in an emergency situation, assessing potential threats and vulnerabilities, developing emergency checklists, conducting annual disaster training, designing an Emergency Operations Center for use in case of an emergency, power loss planning and creating notification procedures. The response and recovery plan includes defining members of teams needed to handle the situation, describing their roles in an emergency as well as maintaining event logs to record information pertaining to the disaster.

9) Certify that the ETC is offering local usage plans comparable to those offered by the incumbent local exchange carrier (LEC) in the relevant service areas;

NTELOS offers calling plans that are superior to the LEC. NTELOS' calling area is larger than the local calling scope provided by the incumbent wireline company. Calling features such as caller ID, voicemail and call waiting are all standard services included with the calling plans.

10) Certify that ETC acknowledges that the Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

NTELOS acknowledges that it may be required to provide equal access if no other ETC in the designated service area is providing equal access.

11) Provide the Study Area Code (SAC), whether the filer is a Rural Carrier and/or a Non-Rural Carrier, and whether the filer is an Incumbent or a Competitive Carrier.

The Study Area Code (SAC) for NTELOS is 199008. NTELOS is a Non-Rural, Competitive carrier.

EXHIBIT A

AFFIDAVIT

**AFFIDAVIT OF R.L. MCAVOY IN SUPPORT
OF VIRGINIA PCS ALLIANCE, L.C.'s AND RICHMOND 20 MHZ, LLC's
USE OF FEDERAL UNIVERSAL SERVICE SUPPORT**

STATE OF VIRGINIA

CITY OF WAYNESBORO

I, R.L. McAvoy, declare as follows:

- 1.) I am employed by NTELOS Inc. as its Senior Vice President – Wireless Engineering and Operations. I am an officer of Virginia PCS Alliance, L.C. and Richmond 20 MHZ LLC and am authorized to give this affidavit on its behalf.
- 2.) Under 47 C.F.R. [§ 54.313/§ 54.314], the Commission is required to submit an annual certification to the Federal Communications Commission (“FCC”) and the Universal Service Administrative Company (“USAC”), certifying that rural and non-rural incumbent local exchange carriers and/or eligible telecommunications carriers serving lines in the service area of a rural and non-rural incumbent local exchange carrier within the Commonwealth of Virginia will use federal high-cost universal service support in a manner consistent with section 254(e) of the Telecommunications Act of 1996 (the “Act”), 47 U.S.C. § 254(e). Absent such certification, such carriers will not receive universal service support. In order for carriers to receive federal support beginning January 1 of each year, the Commission’s certification must be filed with the FCC and USAC by October 1 of the preceding year.
- 3.) NTELOS Inc. hereby certifies that the federal high-cost universal service support Virginia PCS Alliance, L.C. and Richmond 20 MHZ LLC will receive in 2010 will be used for the services and functionalities outlined in 47 C.F.R. § 54.101(a), and that it will only use the federal high-cost support it receives for the provision,

maintenance and upgrading of facilities and services for which such support is intended, consistent with section 254(e) of the Act. NTELOS operates under Study Area Code (SAC) 199008 and is a Non-Rural, Competitive carrier.

- 4.) Also, pursuant to 47 C.F.R. §54.316, the Commission is required to certify to the FCC and USAC that NTELOS' basic rates in rural areas of the Commonwealth of Virginia served by non-rural incumbent local exchange carriers are reasonably comparable to urban rates in order that NTELOS can receive universal service support in 2010. NTELOS' basic rates in rural areas are comparable to the FCC's current urban rate benchmark of \$36.52. Note that this is the urban rate benchmark released in 2008 as the 2009 figure had not been released as of the date of this filing.


FURTHER AFFIANT SAYETH NOT.



R.L. McAvoy
Senior Vice President – Wireless Engineering and
Operations
NTELOS Inc.

Subscribed and sworn to before me this 17th day of August, 2009.





Notary Public

My commission expires: 11/30/2012

Comparison of Virginia PCS Alliance and Richmond 20MHz LLC ("NTELOS") Rates in Rural Wire Centers to National Urban Rate Benchmark – Virginia

<u>Charge or Credit</u>	<u>Plan Amount</u>
Monthly Line Charge- 100 anytime minutes package	\$19.99
Monthly Average Usage	\$0.99
Regulatory Cost Recovery Fee *	\$3.21
Wireless E-911 Fee	\$0.75
Subtotal	\$24.94
Federal Excise Tax	\$0.00
TOTAL	\$24.94
National Urban Rate Benchmark – 2008 figure**	\$36.52
Amount below the Benchmark	\$11.58

*The Regulatory Cost Recovery Fee is comprised of two elements. The first is a \$1.38 charge relating to the recovery of government mandated regulatory programs including Wireless Number Portability and Universal Service Programs (\$0.89) for all customers. The second is a \$1.83 charge that is assessed for Sales Tax Surcharge, GPS service fee and an Interconnect fee.

**The 2009 National Urban Rate Benchmark had not been released as of the date this filing was made so the 2008 figure was used for the calculation.

EXHIBIT B

NTELOS FIVE-YEAR BUILD PLAN AND MAP

VIRGINIA PCS ALLIANCE - 5-YEAR BUILDOUT PLAN IN VIRGINIA

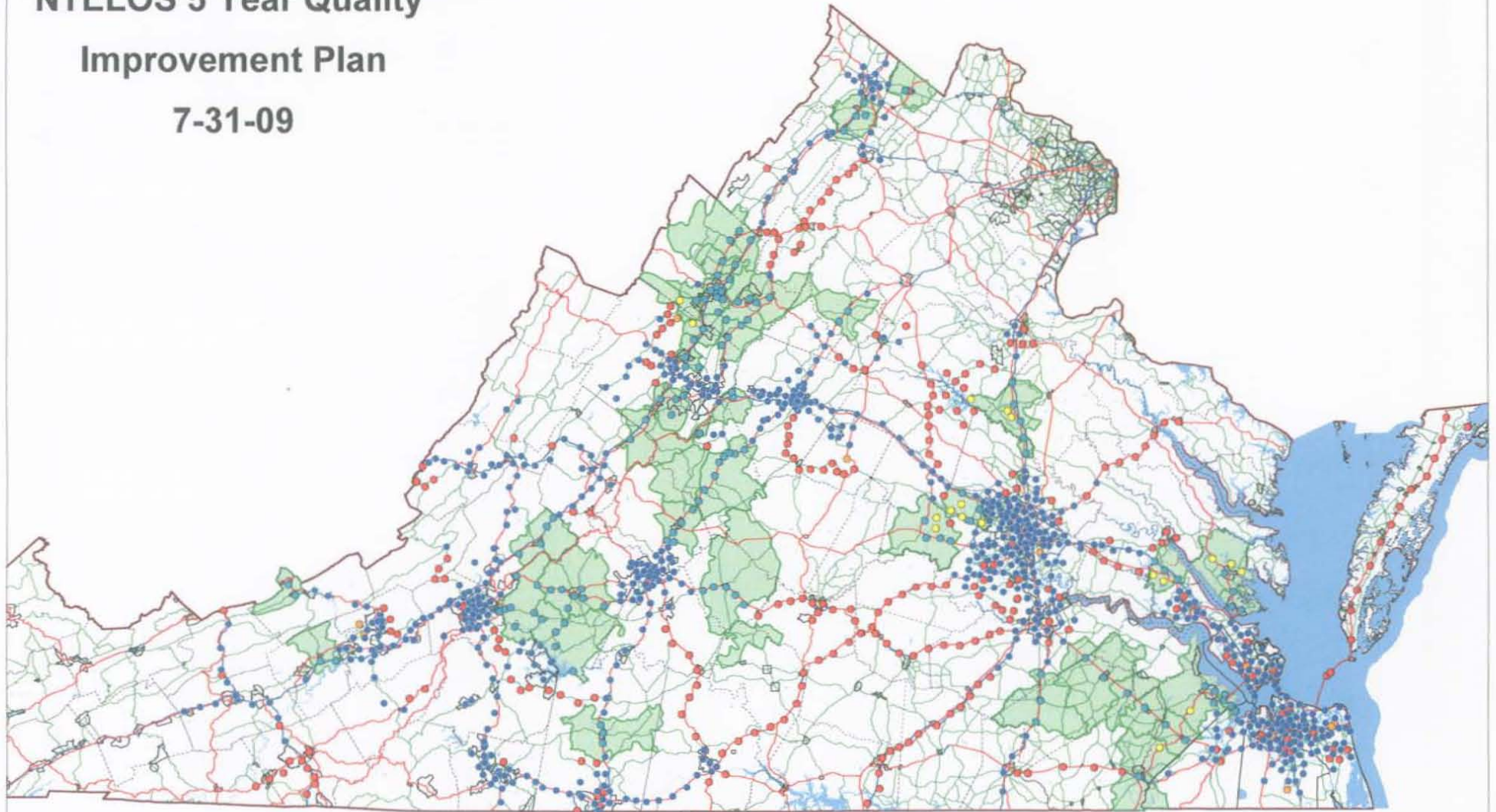
CLLI	Wire Center	2009 Signal Quality	2009 Capacity	2009 Coverage	2010 Signal Quality	2010 Capacity	2010 Coverage	2011 Signal Quality	2011 Capacity	2011 Coverage	2012 Signal Quality	2012 Capacity	2012 Coverage	2013 Signal Quality	2013 Capacity	2013 Coverage
AMHRVAXA	AMHERST	\$0	\$65,390	\$143,440	\$0	\$62,640	\$130,265	\$0	\$60,115	\$130,200	\$0	\$57,785	\$130,140	\$0	\$55,630	\$130,090
APMTVAXA	APPOMATTOX	\$0	\$65,390	\$130,940	\$0	\$62,640	\$130,265	\$0	\$60,115	\$130,200	\$0	\$57,785	\$130,140	\$0	\$55,630	\$130,090
BCHNVABH	BUCHANAN	\$0	\$52,312	\$104,752	\$0	\$50,112	\$104,212	\$0	\$48,092	\$104,160	\$0	\$46,228	\$104,112	\$0	\$44,504	\$104,072
BDFRVABD	BEDFORD	\$0	\$104,624	\$216,104	\$0	\$100,224	\$215,024	\$0	\$96,184	\$214,920	\$0	\$92,456	\$214,824	\$0	\$89,008	\$214,744
BEVLVABV	BERRYVILLE	\$0	\$13,078	\$22,888	\$0	\$12,528	\$22,753	\$0	\$12,023	\$22,740	\$0	\$11,557	\$22,728	\$0	\$11,126	\$22,718
BRWRVAXA	BRIDGEWTR	\$0	\$13,078	\$52,556	\$0	\$25,056	\$189,706	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
BRWVAXA	BROADWAY	\$0	\$39,234	\$192,464	\$0	\$37,584	\$78,159	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
CHHMVACH	CHATHAM	\$0	\$39,234	\$78,564	\$0	\$37,584	\$78,159	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
CRTDVAXA	CRITTENDEN	\$0	\$34,026	\$219,924	\$0	\$32,619	\$93,924	\$0	\$30,918	\$93,924	\$0	\$29,382	\$93,924	\$0	\$27,993	\$93,924
DBLNVADU	DUBLIN	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
DSPAVAXA	DISPUTANTA	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
DSWLAXA	DOSWELL	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
EDOMVAXA	EDOM	\$0	\$13,078	\$107,788	\$0	\$12,528	\$22,753	\$0	\$12,023	\$22,740	\$0	\$11,557	\$22,728	\$0	\$11,126	\$22,718
EKTNVAXA	ELKTON	\$0	\$13,078	\$47,888	\$0	\$12,528	\$26,053	\$0	\$12,023	\$26,040	\$0	\$11,557	\$26,028	\$0	\$11,126	\$26,018
FKLNVAXB	FRANKLIN	\$0	\$11,342	\$94,308	\$0	\$10,873	\$168,908	\$0	\$20,612	\$60,288	\$0	\$19,588	\$60,288	\$0	\$18,662	\$60,288
GLCSVAXA	GLOUCESTER	\$0	\$22,684	\$57,960	\$0	\$21,746	\$57,960	\$0	\$20,612	\$470,760	\$0	\$48,970	\$144,900	\$0	\$46,655	\$144,900
GNWDVAGW	GREENWOOD	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
GRTSVAXA	GROTTOS	\$0	\$39,234	\$273,084	\$0	\$37,584	\$78,159	\$0	\$36,069	\$78,120	\$0	\$34,671	\$78,084	\$0	\$33,378	\$78,054
HAYSVAXA	HAYES	\$0	\$22,684	\$57,960	\$0	\$21,746	\$57,960	\$0	\$20,612	\$57,960	\$0	\$19,588	\$57,960	\$0	\$18,662	\$57,960
HRBGVAXA	HARRISONBG	\$0	\$130,780	\$679,884	\$0	\$137,808	\$286,583	\$0	\$132,253	\$286,440	\$0	\$127,127	\$286,308	\$0	\$122,386	\$286,198
IVORVAXA	IVOR	\$0	\$0	\$22,668	\$0	\$0	\$22,668	\$0	\$0	\$22,668	\$0	\$0	\$22,668	\$0	\$0	\$22,668
LDYSVAXA	LADYSMITH	\$0	\$45,368	\$367,920	\$0	\$43,492	\$115,920	\$0	\$41,224	\$115,920	\$0	\$39,176	\$115,920	\$0	\$37,324	\$115,920
LVTNVALN	LOVINGSTON	\$0	\$104,624	\$209,504	\$0	\$100,224	\$208,424	\$0	\$96,184	\$208,320	\$0	\$92,456	\$208,224	\$0	\$89,008	\$208,144
MDSNVAMA	MADISON	\$0	\$26,156	\$64,876	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
MGLVAXA	MCGAHEYSVL	\$0	\$65,390	\$384,340	\$0	\$62,640	\$130,265	\$0	\$60,115	\$130,200	\$0	\$57,785	\$130,140	\$0	\$55,630	\$130,090
MKNKVAMN	MANAKIN	\$0	\$34,026	\$212,940	\$0	\$32,619	\$86,940	\$0	\$30,918	\$224,540	\$0	\$39,176	\$528,720	\$0	\$65,317	\$202,860
NRWSVANA	NARROWS	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
PWHTVAPW	POWHATAN	\$0	\$45,368	\$241,920	\$0	\$43,492	\$115,920	\$0	\$41,224	\$115,920	\$0	\$39,176	\$391,120	\$0	\$55,986	\$173,880
RPHNVAXA	RAPHINE	\$0	\$26,156	\$58,976	\$0	\$25,056	\$58,706	\$0	\$24,046	\$58,680	\$0	\$23,114	\$58,656	\$0	\$22,252	\$58,636
SMFDVAXA	SMITHFIELD	\$0	\$45,368	\$314,232	\$0	\$43,492	\$262,832	\$0	\$51,530	\$154,212	\$0	\$48,970	\$154,212	\$0	\$46,655	\$154,212
SNMTVASM	STONE MT	\$0	\$65,390	\$134,240	\$0	\$62,640	\$133,565	\$0	\$60,115	\$133,500	\$0	\$57,785	\$133,440	\$0	\$55,630	\$133,390
STCKVAXA	STONYCREEK	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
STCYVASC	STEPHENSCT	\$0	\$52,312	\$91,552	\$0	\$50,112	\$91,012	\$0	\$48,092	\$90,960	\$0	\$46,228	\$90,912	\$0	\$44,504	\$90,872
STDRVASD	STUARTS DRAFT	\$0	\$52,312	\$254,752	\$0	\$50,112	\$120,712	\$0	\$48,092	\$120,660	\$0	\$46,228	\$120,612	\$0	\$44,504	\$120,572
STTNVAVE	STAUNTON	\$0	\$52,312	\$111,352	\$0	\$50,112	\$110,812	\$0	\$48,092	\$110,760	\$0	\$46,228	\$110,712	\$0	\$44,504	\$110,672
TOANVATO	TOANO	\$0	\$34,026	\$282,924	\$0	\$32,619	\$369,124	\$0	\$51,530	\$151,884	\$0	\$48,970	\$151,884	\$0	\$46,655	\$151,884
WKFDVAXA	WAKEFIELD	\$0	\$11,342	\$94,308	\$0	\$10,873	\$31,308	\$0	\$10,306	\$31,308	\$0	\$9,794	\$31,308	\$0	\$9,331	\$31,308
WNSVAXA	WINDSOR	\$0	\$22,684	\$188,616	\$0	\$21,746	\$62,616	\$0	\$20,612	\$62,616	\$0	\$19,588	\$62,616	\$0	\$18,662	\$62,616
WNTRVAVG	LOVINGSTON	\$0	\$26,156	\$52,376	\$0	\$25,056	\$52,106	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
WVRLVAVV	WAVERLY	\$0	\$11,342	\$91,980	\$0	\$10,873	\$28,980	\$0	\$10,306	\$28,980	\$0	\$9,794	\$28,980	\$0	\$9,331	\$28,980
WYCVVAXA	WEYERSCAVE	\$0	\$13,078	\$26,188	\$0	\$12,528	\$163,653	\$0	\$24,046	\$52,080	\$0	\$23,114	\$52,056	\$0	\$22,252	\$52,036
DYTNVAXA	DAYTON	\$0	\$13,078	\$45,388	\$0	\$12,528	\$26,053	\$0	\$12,023	\$26,040	\$0	\$11,557	\$26,028	\$0	\$11,126	\$26,018
Column Totals		\$0	\$1,538,228	\$6,164,604	\$0	\$1,525,150	\$6,119,216	\$0	\$1,486,329	\$4,201,770	\$0	\$1,487,438	\$4,093,400	\$0	\$1,464,798	\$4,345,816
Yearly Totals				\$7,702,832			\$7,644,366			\$5,688,099			\$5,580,838			\$5,810,614

Notes

- 1 - 2009 new coverage sites are budgeted and we are currently targeting activation by end of year.
- 2 - New sites beyond 2009 have not yet been approved.
- 3 - Capacity dollars are estimates based on the need for additional channel cards and carriers. In reality dollars will probably shift between years and markets (for example, we may spend more in 2009 in the Amherst wire center than our estimate but less in Toano and vice-versa in 2010).
- 4 - All capacity dollars are estimates and will vary based on actual usage and subscriber growth.
- 5 - 2009 capacity dollars include costs associated with the EV-DO project.
- 6 - 2011-2013 totals are dependent on 2009 growth and can/will fluctuate based on projects completed in 2010 or pushed to future years.

NTELOS 5 Year Quality Improvement Plan

7-31-09



- nTelos Site on Air - ETC Payout Area
- nTelos Site on Air - Non ETC Payout Area
- Planned nTelos Site - ETC Payout Area
- Planned nTelos Site - Non ETC Payout Area
- Proposed nTelos Site - ETC Payout Area
- Proposed nTelos Site - Non ETC Payout Area
- Current NTELOS ETC Payout Area

EXHIBIT C

NTELOS MAJOR OUTAGE REPORT

Major Outages -- January 1, 2008 through December 31, 2008

Date	Time Start	Time End	Duration	Geographic area	Element	Event	Impact	Root Cause/Resolution	Reported Trouble Tickets Per Tech Support (Reflects all tickets recorded by NTELOS for event and is not limited to ETC region being evaluated)	Number of customers potentially affected
01/17/2008	7:00	9:00	2 hrs	Norfolk BTA	Lucent 5E	Hardware failures associated with SM1 triggered overload conditions. The first occurrence of the overload condition on Switch Module 1 (SM 1) was at 7am and the last occurrence was at 9am. There were a total of 12 occurrences each lasting between 30 - 45 seconds. There are approximately 25 - 30 sites homed off SM 1 that were impacted during the overload condition. Most of those sites are located on the Peninsula.	Customers reported experiencing two issues: 1) Customers can receive calls but outbound calls get "calling..." but does not connect. 2) Outbound calls get "network busy" error message.	SM hardware failure	40	114,738
02/15/2008	3:00pm	7:00pm	4 hrs 0 mins	Lynchburg, Martinsville, Staunton-Waynesboro BTAs	CBSC	Call ceiling reached on the CBSC platforms caused call shedding.	Customers in Staunton, Waynesboro, Lynchburg and Martinsville areas reported getting delayed connection and call failed messages.	Capacity exceeded on CBSCs 965 and 963.	34	
02/02/2008	4:32pm *FTE	5:32pm *LTE	1 hr 0 mins	Richmond, Norfolk, Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs.	STP	STP failure caused call processing failure.	Outbound and inbound calls getting either fast busy or the "all circuits busy" message. Both landline to mobile and mobile to landline were affected.	STP card failed to successfully reboot. The action is suspected of putting bad data on the buss causing a slight disruption of the communication to the Waynesboro MTX.	83	315,718
03/06/2008	1:16pm	4:40pm	3 hrs 24 mins	Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs	Prepay Trunks	25% of prepay trunks went out of service. Veisign restored.	Customers getting fast busy or "all circuits busy" message when calling out.	25% of Prepay trunks were out of service.	276	108864
03/27/2008	4:44pm	6:20pm	1 hour 36 min	Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs	Acculink	Switch engineer went to the acculink to review which slots were available to add additional links for an SS7 augment to MM964, he pulled two unseated cards out for review. When he pulled these cards out, he accidentally bumped the cables that were connected to the active cards carrying live traffic for MM964 and dislodged them from their ports. This action caused two SS7 links to go down initially and then the remaining links dropped because they couldn't hold the entire call load during busy hour. Cables were reconnected, but the system did not resynch quickly due to the high traffic volume.	3/27/08 (16:44 - 17:50) Call processing load degraded by 30%; (17:50-18:20) All call processing on MM964 down - all NTLs, Sprint and any roamers in the Roanoke market and part of the WYBO market (three core sites - WBO Arby's, MTSO and W.WBYO) experienced total call processing outage.	Performing activities on or around critical equipment (Acculink) outside of maintenance window.	277	130,442
04/26/2008	1:00am	8:00am	7 hrs 0 mins	Danville, Lynchburg, Martinsville, Roanoke, Staunton-Waynesboro, Charlottesville, Harrisonburg, and Winchester BTAs	Tellabs 5500 DACS	DACS failure	Customers unable to make or receive calls.	Tellabs 5500 DACS had three discrepancies: 1) Defective OC-48 card, 2) Defective IMM card, and 3) Outdated software load.	270	130,442